

Solomon Radner, Esq. (283502018)
LAW OFFICE OF KEITH ALTMAN
33228 West 12 Mile Road, Suite 375
Farmington Hills, MI 48334
Telephone: (248) 987-8929
solomonradner@kaltmanlaw.com

Attorney for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOSEPH D. LENTO, ESQ., an individual,
LENTO LAW FIRM, LLC, a limited
liability company,

Plaintiffs,

v.

KEITH ALTMAN, ESQ., an individual,
THE LAW OFFICE OF KEITH ALTMAN,
PLLC, a/k/a “K ALTMAN LAW”, a limited
liability company, ARI KRESCH, an
individual, and RICHARD GILL, an
individual,

Defendants.

Civil Action No.: 1:22-cv-04840

Hon. Robert B. Kugler

**DEFENDANTS’ MOTION FOR LEAVE TO FILE BRIEF IN EXCESS OF
TWENTY-FIVE PAGES**

Defendants Keith Altman and the Law Office of Keith Altman, PLLC, by counsel, hereby requests leave to file a brief in support of their Motion to Dismiss Pursuant to Rule 12(b)(6) in excess of twenty-five pages, and up to fifty (50) pages. Plaintiffs have alleged thirteen (13) causes of action and complex RICO claims, and Defendants' memorandum addresses multiple procedural and substantive hurdles that are dispositive of Plaintiffs' claims that must be addressed lest Defendants waive the argument. Finally, Defendants have offered additional arguments for the Court's consideration and confirming why the case should be dismissed *with prejudice*. Given these circumstances and the significance of the issues at stake, Defendants submit that good cause exists for permitting Defendants to exceed the Court's twenty-five page limit for briefs.

WHEREFORE, Defendants Keith Altman and the Law Office of Keith Altman, PLLC respectfully request that the Court enter an Order granting their Motion for Leave to File Brief in Excess of Twenty-Five Pages (and up to fifty (50) pages, and granting such further relief as the Court deems just and proper.

Dated: November 7, 2022

Respectfully submitted,

/s/ Solomon M. Radner

Solomon M. Radner, Esq. (283502018)

LAW OFFICE OF KEITH ALTMAN

33228 West 12 Mile Road, Suite 375

Farmington Hills, MI 48334

Telephone: (248) 987-8929

solomonradner@kaltmanlaw.com

Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned attorney for Defendants hereby certifies that a true and correct copy of the foregoing document has been electronically filed and is available for viewing and downloading from the ECF system in accordance with the local Federal Rules of Civil Procedure and has been served electronically upon counsel the following on this day, November 7, 2022.

Dated: November 7, 2022

By: */s/Solomon M. Radner*
Solomon M. Radner, Esq.